

REMARKS/ARGUMENTS

This is in response to Office Action dated June 4, 2009. By present amendment, claims 1-7, 12-18, and 21-23 are pending. Reconsideration and withdrawal of the rejections are respectfully requested.

Claim 1 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Stachowiak (U.S. Pat. No. 6,602,608) in view of Medwick (U.S. Pat. No. 6,682,773) and Konda (U.S. Pat. No. 5,254,201). This rejection is respectfully traversed.

Claim 1 is not obvious over Stachowiak in view of Medwick and Konda. Although the Office Action continues to contend that it would have been obvious to one of ordinary skill in the art to modify Stachowiak to contain the coatings taught by Medwick and Konda, Applicant respectfully submits that such a three-way combination is improper.

Stachowiak is directed toward a coated article with an improved barrier layer structure and method of making the same. Stachowiak does not disclose or suggest a removable coating added to the top of the substrate to protect the substrate prior to heat treatment. Further, even if Stachowiak were modified in view of Medwick, the alleged combination would not meet all the features of claim 1. Moreover, Stachowiak/Medwick would not be modified in view of Konda. Medwick teaches directly away from modification in view of Konda, and implementation of the protective coating taught by Konda into the protective coating taught by Medwick would destroy the function and purpose of Konda. For the following reasons, Applicant respectfully submits that the cited prior art does not render obvious claim 1.

Medwick teaches directly away from combination with Konda because Medwick requires the protective coating to be very thin, in order for the substrate to retain the ability to be cut successfully into smaller pieces prior to the coating being washed off. Medwick would not be

modified to have a thick sheet because its specification discloses that if the sheet is too thick, there will be an adverse effect on the underlying glass pieces. At col. 11, line 33, Medwick's specification states "[i]f the removable protective coating 16 is too thick, the conventional cutting wheel may not be able to make sharp scores in the larger glass piece, which can adversely impact upon breaking out the smaller glass pieces." Medwick's specification teaches that 1 to 2 microns is the most desirable thickness for a protective coating, and the example protective coatings in Medwick that provide a thickness provide values from 7 to 10 microns. (See Medwick, col. 10, lines 30-32, and table 1, in between cols. 21 and 22). Thus, Medwick teaches that if the protective coating is significantly thicker than that, problems could arise when the glass is cut into smaller pieces.

Konda, on the other hand, discloses that a sheet with a thickness of 25-200 microns is necessary, with the example being 100 microns thick. (Konda, col. 3, lines 27-28, and col. 4 line 28). The coating must be sufficiently thick so as to protect the delicate, underlying semiconductor wafer. Medwick would not be modified to contain the thicker peelable coating disclosed by Konda, as it would have an adverse effect on the smaller pieces of glass, when they were cut. Not only does Medwick teach away from using a thicker protective coat that would render the glass more difficult to cut, but such substitution would render Medwick inoperable for its intended purpose of for providing a protective coating for glass sheets up to and *beyond* the cutting process.

The protective coating taught by Medwick also could not successfully be modified in view of that taught by Konda due to the fact that the protective coating taught by Konda does not solve or ameliorate the problems discussed by Medwick with respect to peelable coatings, because the surface area of the protective coating taught by Konda is far too small to ever


experience the problems discussed in Medwick. Medwick is specifically directed toward providing a protective coating for glass that is larger than about 4 feet by about 5 feet. (Medwick, col. 5, lines 21-22). The problems Medwick discusses associated with the removal of peelable protective coatings, such as pieces being left behind, and a question of what to do with the waste material, are those that are associated with removing a peelable coating from a substrate with a large surface area. (See Medwick, col. 2, lines 17-28, for a discussion of the disadvantages of peelable coatings). In terms of surface area, Konda uses a much smaller protective sheet to deal with an entirely different problem – damage due to static electricity. (Konda, col. 1, lines 61-68). Removing a peelable coating from a “substrate” with a diameter of four inches will not cause the same problems as when a coating is peeled off of a glass sheet that has a surface area of 20 square feet. Konda does not solve any of the problems that Medwick describes as the negative effects of peelable protective coatings, because those problems will not be present when removing a coating from something as small as Konda’s semi-conductor wafers. Therefore, modifying Medwick by applying the teachings of Konda to Medwick would still not solve the problems described by Medwick. Due to the thickness of the coating taught by Konda, and the small size of the “substrate” to which the protective coating of Konda is applied, one of ordinary skill in the art would not modify Medwick in view of Konda to contain the protective coating taught by Konda.

For the foregoing reasons, Applicant respectfully submits that the three-way combination of Stachowiak, Medwick, and Konda is improper. Applicant also submits that all claims are in condition for allowance. Reconsideration and withdrawal of the rejection are earnestly solicited. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

• RICHARDSON et al.
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